

PRIVACY POLICY

This website: www.pushindiapush.com (“**Website**”) is owned and operated by **Rural Development Kendra (“the Trust”)** and used under licence by its affiliates.

We are committed to respecting the privacy rights of all visitors/users of our Website. Through this Website, we aim to provide an ultimate platform for fitness enthusiasts to showcase their skills and push their limits, by way of organising an unconventional and pioneering event in the form of a [PushIndiaPush Challenge](#) (“**Challenge**”, “**Competition**”). The PushIndiaPush Challenge has been contemplated so as to revolutionise the very essence of Push-Ups as an exercise and awaken the Indian fitness space with an innovative way. This Website has been published with the purpose of, *inter alia* – providing information about the Challenge, engaging the participants, providing a medium to register for the Challenge, tracking the Competition, and successfully organising the said Competition.

Your privacy is important to us and we aim for our Website and initiative to be a safe and enjoyable environment for our audience and participants. We respect and safeguard the personally identifiable information (“**Personal Information**”) we receive and collect from you on our Website, and in the course of our other interactions for the entire duration of the said Competition.

The Website essentially enables the visitors/users to register for the Challenge. Registration for and participation in such Challenge by the visitors who visit this Website (“**you**”, “**your**” or “**user**”) or your visit/use of this Website is conditioned upon your acceptance of the terms and conditions contained in Terms and Conditions (“**T&C**”) as available on the Website and this Privacy Policy (“**Privacy Policy**”).

We are fully committed to respecting your privacy and want you to understand how we collect, use, and share data about you. This Privacy Policy covers our data collection practices and describes your rights to access, correct, or restrict our use of your personal data. We are committed to protecting it through our compliance with this Privacy Policy. Thus, it is imperative that you review this Privacy Policy.

This Privacy Policy has been drafted and published in accordance with the **Information Technology Act 2000**; and the **Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules 2011**. This Privacy Policy shall constitute a formal and legally binding agreement between you, as a user of the Website, and us, as the owner of the Website.

You signify that you have read, understood and agree to be bound by this Privacy Policy. If you do not agree with any provisions of this Privacy Policy or the Terms & Conditions, the ‘Privacy Policy’, the ‘Competition Registration & Participation Policy’, and the ‘Content & Image Protection Policy, then you may not use/access this Website.

1. INTRODUCTION:

For the purposes of this Privacy Policy, the following Terms shall have the meaning assigned as below:

- a. “**Act**” shall mean the Information Technology Act, 2000 and Rules thereunder as amended from time to time.
- b. “**Challenge**” shall mean the PushIndiaPush Challenge which is being organised by the Website.
- c. “**Information**” shall mean and include Personal Information and Sensitive Personal Data and Information as may be collected by the Website.
- d. “**Personal Information (PI)**” shall have the same meaning as under Rule 2(i) of the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011 as amended from time to time.

- e. **“Rules”** shall mean the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011 as amended from time to time.
- f. **“Sensitive Personal Data and Information (SPDI)”** shall have the same meaning as under Rule 3 of the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011 as amended from time to time.
- g. **“User/user”, “You/you”, “Your/your”** means any person who views, browses, accesses or uses our Website.
- h. **“Use” or “Using”** means to browse, access, view, copy, availing other benefit from using the Website.
- i. **‘We’, ‘Us’ and ‘Our’** shall refer to Trust and its affiliates and operator of the website
- j. **“Participant”** means a User who is registering to participate in the Challenge.
- k. **“Services”** means all the platform services as provided in the T&C.

Users’ correspondence, transactions/offers or related activities with third-parties, including but not limited to payment providers, logistics providers and verification service providers, are solely between the User and that third-party. By providing us with your Personal Information you expressly consent to us processing your Personal Information in accordance with the terms of this Privacy Policy.

2. DATA COLLECTED FOR THE COMPETITION:

We collect the following data from the Users in the manner stated in this Privacy Policy:

- a. For the purposes of registration for the Challenge, personally identifiable information such as your name, age, location, email address, phone number, date of birth, gender, and/or other similar information is collected from you.
- b. Date and time of your visit on our Website along with the navigation details such as webpages visited and time spent on each webpage, and the details of the referring site is collected.
- c. Data regarding your device such as the type of device, type of operating system, type of web browser, and IP (internet protocol) address is collected.
- d. The call facility provided by the Website for customer support can be recorded for quality control checks to provide better service to the customers, as evidence and for any other purpose as mandated by the law.
- e. Information from Service use: we log usage data when you visit our Website; the types of content you view or engage with; the language; the actions you take; and the time, frequency and duration of your activities on our Website along with the navigation details such as webpages visited and time spent on each webpage, and the details of the referring site.
- f. Performance information concerning the participation in the Challenge shall be collected – and data in the form of pictures, videos, and other ‘content’ as defined in the Content & Image Protection Policy, shall be collected any time during the entirety of the Competition.
- g. Surveys: Finally, we may collect additional information from or about you in other ways, including but not limited to, when you provide feedback(s), modify your content or email preferences, respond to surveys, provide comments, or communicate with us. Such information may include your name, email address, mobile number, location, etc., and information that you may specifically choose to provide us.

3. MANNER OF DATA COLLECTION:

- a. We collect the data in the form of Automatic information collection by the Website. Most of the PI or SDPI that we collect is directly provided by you. In the following situations, we will collect and process the information about you:
 - i. Where you register yourself on the Website for the Challenge, we collect and store your personal information you voluntarily provide such as name, email address, phone number, gender, health information, geographical information such as city, and other information as may be collected at the time of registration for the Competition.

- ii. Where you provide information regarding yourself when you make an enquiry through an enquiry form or email.
 - iii. Where you provide PI/SDPI directly to us over telephone – we may make and keep a record of such information shared by you.
 - iv. Where you voluntarily complete any user survey or provide feedback to us via email or any other channel.
 - v. Where you provide Personal Information to us in physical form whether sent through post or courier or handed over to us.
- b. Other data such as videos, photos, and ‘content’ in accordance with the Content & Image Protection Policy is collected during the Challenge / Competition.
- c. Furthermore, in the future, we may allow log in facility through Google or any other social login – you adhere to our Privacy Policy and T&C, as well as the Privacy Policies and terms of service of Google and other social media websites. Please read the terms of service and Privacy Policy for any social media login you might be using to understand how data is collected and used.

4. USE OF DATA:

We use the information we collect about you for the following purposes or in the following manner:

- a. To provide and maintain the Website’s Services: We use the information collected from you to provide, support, personalize, maintain, deliver, provide and develop our Services and verify users’ identities. How we use your personal information will depend on which Services you use, how you use those Services and the choices you make in your Settings. We use the information we have about you to provide and personalize our Services, including with the help of automated systems and inferences we make, so that our Services can be more relevant and useful to you and others associated with the Competition. We use the IP address and unique identifiers stored in your device’s cookies to help us authenticate your identity and activities and provide services. Given our legal obligations and system requirements, we cannot provide you with all or some of our services without data like identification information, supervision information, service usage information, communication information, and transaction information.
- b. To protect our users: In some cases, we may also have a legal obligation to collect Personal Information from you or may otherwise need the Personal Information to protect your vital interests or those of another person. We use IP addresses and cookies to protect against automated abuse such as spam, phishing, and Distributed Denial of Service (DDoS) attacks. Further, we analyse browsing activities with the goal of detecting suspicious behaviours as early as possible to prevent potential fraud and loss of funds to bad actors.
- c. For other business purpose: By registering on the Website, you give us your express consent to receive promotional emails about more such competitions and emails or calls announcing any changes in the Challenge. If at any time, you decide that you do not wish to receive any such emails, you can opt out of receiving such emails. Additionally, we do use comments made by you about the Challenge for marketing purposes and by making such comments you expressly consent to the usage of these comments for such purposes.
- d. Legal obligation: We may need to disclose your Information to law enforcement agencies, government agencies or other third parties where we are compelled so to do by court order or similar legal procedure; where we are required to disclose your Information to comply with law; where we are cooperating with an ongoing law enforcement investigation or where we have a good faith belief that our disclosure of your

Information is necessary to prevent physical harm or financial loss, to report suspected illegal activity or to investigate a possible violation of our T&C.

- e. Promotion & Marketing purposes: The collected data could be used by us for Promotional and Marketing purposes.

5. COOKIES

a. What Are Cookies?

Cookies are small amounts of data that are sent to your browser and stored on your computer's hard drive to collect standard internet log information and visitor behaviour information. When you visit our Website, we can automatically collect information from you through cookies or similar technologies.

For more information on Cookies, please visit: https://en.wikipedia.org/wiki/HTTP_cookie

b. How Do We Use Cookies?

We use cookies in a range of ways to make your experience on our Website more enjoyable, including but not limited to:

- i. Authentication: We use cookies to verify your account and determine when you're logged in so that we can make it easier for you to access our Services and show you the appropriate experience and features. If you're signed into the Website, Cookies help us show you the right information and personalize your experience in line with your settings.
- ii. Security: We use cookies to help us keep your account and information safe and secure and help us detect any malicious activity and violations.
- iii. Preferences, features and Services: We use cookies to enable the functionality of our Services, and provide you with features, insights and customized content. We also use these technologies to remember information about your browser and your preferences.
- iv. Advertising, recommendations, insights and measurement: We use cookies to record our performance and verify the effectiveness of online advertising through third-party services with cookies.

c. What Types of Cookies Do We Use?

We use different types of cookies, including but not limited to:

- i. Functional Cookies: We use such cookies to help us identify you and remember your previous preferences and settings, which may include your device, your operating system, your preferred language, your location, and other session data. We use a mix of first-party and third-party cookies. We use Cookies to improve your experience of Services.
- ii. Targeting Cookies: We use these cookies to collect information about your visit to our Website, the content you view, the links you follow, and other information about your browsers, devices, your IP addresses and referral URLs. These Cookies may be set through our site by our advertising partners and maybe used by them to build a profile of your interests and show your relevant advertisements on their websites. This means that when you visit another website, you may also be shown advertisements based on your browsing patterns. If you do not allow these Cookies, you will experience less targeted advertisement.
- iii. Necessary Cookies: Such Cookies are necessary for our Website to function and are usually set in response to actions made by you which amount to a request for Services, such as – *inter alia*, setting your privacy preferences, log in information, filling in forms. These Cookies do not store any personal identifiable information and cannot be stitched off in your systems.

- iv. **Performance Cookies:** We use these Cookies to determine and measure the performance of our Website. We use these Cookies to understand and improve our features and Services, including as you navigate through our Website or when you access it from other websites, applications or devices.
- d. **How to Manage Cookies?**

Most browsers are pre-set to accept cookies. Where required, you can adjust your browser setting to prevent cookies or to notify you as soon as cookies are loaded. We enable you to reject the use of certain cookies for purposes such as advertising, by visiting your cookie settings, without affecting the lawfulness of processing based on your consent before its withdrawal. You can change your preferences at any time by visiting settings. However, stopping all cookies might mean that you cannot access or use some features of the Website.

6. LINKS TO THIRD-PARTY WEBSITES

- a. We may provide links of other websites of interest on the Website, without any accuracy, completeness, or usefulness of any content, warranty, merchantability, endorsement, suitability, any assurance of quality, authenticity, and appropriateness to view such websites and responsibility, liability, obligations on part of the Website. This Policy does not apply when you access such sites or links.
- b. These third-party websites may use technology to send the advertisements that appear on the Website directly to User. We do not have access to or control over the Cookies or other features that such third-party websites may use, and the information practices of these third-party websites are not covered by this Policy. Therefore, we cannot be held responsible for the protection and privacy of any information which user provides whilst visiting such websites of interest. Users shall contact them directly for more information about their privacy practices.
- c. Any opinions, advice, statements, services, offers, or other information or content expressed or made available by third parties, including information providers, or any other users are those of the respective author(s) or distributors and not of the Website or its representatives.

7. SECURITY & STORAGE OF DATA:

- a. We hold your Personal Information on secure servers. By providing us with Personal Information, you consent to the transfer of your Personal Information to, and its storage on, our secure servers. We take every precaution to safeguard all your Personal Information from unauthorized access, use or disclosure. However, the internet is not a secure medium and we cannot guarantee the privacy of your Personal Information.
- b. The information provided by the user is stored in access-controlled facilities with restricted access. Personal Information transmitted over the internet is protected through the use of encryption, using the Secure Socket Layer (SSL) or equivalent protocols.
- c. We shall use generally accepted industry standards to protect the Personal Information submitted to us, both during transmission and upon receipt. However, please be advised that no method of transmission over the internet, or method of electronic storage, is 100% secure. Therefore, even though we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security. We also cannot warrant that such Personal Information may not be misused in the event our safeguards and protocols are breached by a malicious third-party. Further, we are not liable for nor can we fully control the actions of other users with whom you may choose to share your information.
- d. It is the responsibility of the user to keep the passwords and other credentials (if any) confidential.

- e. The collection, usage, and sharing of user information by us shall be in compliance with the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 and other applicable laws.

8. DISCLOSURE AND SHARING OF DATA:

- a. Where PI/SPDI is required to be shared, arising out of any contractual obligation, we shall part with such PI/SPDI on a need to know basis. To the extent necessary to provide you the requested Services or to the extent required under applicable law, we may provide your PI/SPDI to the following Third Parties without notice to you:
 - i. Consultants (including auditors, authorized vendors) on a 'need to know' basis under a Non-Disclosure Agreement;
 - ii. Governmental authorities, in such manner as permitted or required by applicable law.
- b. All employees of the Website have been selected in accordance with our strict security policies and practices and are bound by confidentiality obligations. Our employees are subject to stern disciplinary action, including termination, civil liability, and criminal prosecution, if they fail to meet any of these obligations, as stated.
- c. The Website may also use third party vendors or service providers to help us provide services to you, such as courier services, operating the payment gateway functionality of the website, tailoring services with the help of boutiques, tailors, cloth stores, etc. Such third parties are required to maintain the confidentiality of the information we provide to them under contract and under law.

9. AGREEMENT:

This Policy along with the Website Terms & Conditions and any other relevant policies or disclosures contains the entire understanding and agreement between the User and the Website. This Policy cannot be changed or terminated orally. If any provision of this Policy is held to be illegal, invalid or unenforceable, this will not affect any other provisions and the Policy will be deemed amended to the extent necessary. Any provision which must survive in order to allow us to enforce its meaning, shall survive the termination of this Policy. This Policy should at all times be read along with the Website Terms & Conditions.

10. CHANGE IN PRIVACY POLICY:

We may update our Privacy Policy from time to time. Thus, you are advised to review this page periodically for any changes. These changes are effective immediately after they are posted on this page. If we make changes to this Privacy Policy, including a material change in the way we use your Personal Information, it will be deemed to be notified to and read and agreed by you on your using the Website and/or related Services once we post the same on our Website. Your continued usage will constitute express consent to us continuing to process your Personal Information in accordance with the terms of our revised policy.

11. RETENTION AND REVOCATION OF DATA:

We shall retain the records as per applicable laws and such other statutory / regulatory requirements from time to time. In the event any legal / regulatory proceeding is pending, we can retain records for a longer period. We shall store the data/ information/ records on a server. We may keep our records of the electronic instructions/transactions in any form as permitted under Applicable law. In this regard, all records, whether in electronic form, magnetic form, documents or any other form with respect to electronic instructions/ online transactions shall be conclusive evidence of such instructions/ transactions and shall be binding on the user. In

the event you wish to no longer avail our Services or intend to request that the Website no longer retains your PI/SPDI or where you intend to modify the current PI/SPDI, you may contact us as provided herein below.

12. CONTACTING US :

For questions related to updating or changing your registration information or any other information provided by you as established above, and for your valuable feedback on this Privacy Policy, please send an e-mail to support@pushindiapush.com.